



Via Email and UPS Overnight

April 3, 2012

Mr. Minesh Patel  
Illinois Environmental Protection Agency  
Bureau of Air (MC 11)  
1021 N. Grand Avenue East  
Springfield, IL 62702

Koppers Inc.  
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STATE OF ILLINOIS

APR 04 2012

Environmental Protection Agency  
BUREAU OF AIR

RE: Koppers Inc., Stickney Plant  
ID Number: 031300AAJ  
Preliminary Draft Construction Permit for #2 Tube Heater

Dear Mr. Patel:

Thanks you for the opportunity to review a preliminary draft construction permit for a new tube heater for Tar Distillation System #2 at Koppers' Stickney, Illinois facility. Please find below our comments on the preliminary draft as discussed with you and Mr. Wei Han on March 26, 2012.

Condition 2.c. Koppers has requested, and IEPA has agreed to look into the applicability of this requirement to the distillation system/tube heater. Koppers pointed out that the CAAPP Permit 96030134 cites 218.301, 218.302 and 218.966 as applicable requirements and to avoid confusion, Koppers wishes to clarify correct rule applicability for VOM emissions.

5. Emissions Limits - Koppers provides the revised table as the correct limits to include in the table for this permit condition. The revised table includes the combined still (combusted in tube heater) emissions and natural gas combustion emissions.

#### Emission Limits

The emissions of affected system shall not exceed the following limits. Compliance with the annual limits shall be determined from a running total of 12 months of data.

Pollutant	Limit	
	Lbs/Hour	Tons/Year
CO	3	10
NO <sub>x</sub>	6	20
PM/PM <sub>10</sub>	0.5	2
SO <sub>2</sub>	41.4	181.2
VOM	3	10

7. a. Koppers requests that IEPA reduce the number of tests required in this condition and to clarify the frequency of testing. Koppers requests one initial test and one confirming test between 9 and 12 months of the previous sampling and analysis.

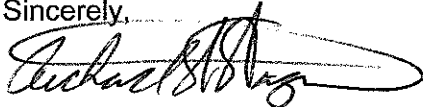
7.c. Koppers requests that IEPA clarify that the permittee shall submit the results of the testing to IEPA one time in the AER following testing, and to update the results if testing is repeated in the future.

9.c.iii. and iv. IEPA explained to Koppers that the purpose of these two conditions is to provide a method to determine actual SO<sub>2</sub> emissions. Yet, Condition 9.b.i. requires Koppers to establish an SO<sub>2</sub> emission factor and maximum hourly emission rate used to determine SO<sub>2</sub> emissions from the distillation system. Koppers submits to the agency that a conservative estimate of actual emissions from the distillation system can be based on the maximum hourly SO<sub>2</sub> emission rate applied to the actual hours of operation of the distillation system during the reporting period. This approach will avoid the costly and problematic measurements of the flow of the process waste gas required in 9.c.iii. and iv.

9.e Koppers requested, and IEPA agreed to clarify in the permit that the requirement to maintain records for upsets in the operation are exclusive of times when the process gases are routed to the existing thermal oxidizer.

If there are any other questions with regards to the preliminary draft construction permit, comments please do not hesitate to contact Stephanie Flynn, Stickney Plant Environmental Manager at 708-222-3481.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard W. Wagner", with a large, sweeping flourish at the end.

Richard W. Wagner  
Plant Manager

cc: Bernard Evans, P.E.; ERM, Inc.  
John Irvine, Koppers Inc.